



CSDVRS, LLC

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March 17, 2011

Joel Gurin, Chief
Consumer and Governmental Affairs Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51

Dear Mr. Gurin:

By letter to you dated March 3, 2011, CSDVRS expressed the importance of fully automated systems for generating call detail records ("CDRs") as an essential means of protecting consumer interests and the integrity of the TRS Fund by eliminating any manual entries to or notations on CDRs. CSDVRS is taken aback by Sorenson's letter¹ in response, which states that their interpreters should be able to manually mark standard telephony events (such as busy and no answer) in the CDRs for payment or non-payment.

Creating pristine and non-manipulated CDRs is a critical component of a sound and untainted TRS compensation process. Given that CDRs serve as the basis for the verification of the authenticity of a relayed call and the corresponding payment and given the substantial volume of potentially compensable relay minutes generated by providers, an automated system totally free of human touch is absolutely necessary.

At CSDVRS, our CDRs automatically note the start of "conversation" time when the called party's phone is placed in use. When this occurs, our system records "answer supervision," a standard method telephony event automatically detected by telephone switches which indicates that a successful connection to another PSTN based telephone has been created and triggers the creation of a CDR for billing purposes. For a busy signal and when the called party does not answer the phone, there is no "answer supervision" recorded in CSDVRS' CDRs. In no event does a busy or no answer allow for a billable CDR to be created in CSDVRS's system. There should be no manual intervention required for this process.

¹ See, Letter from Sorenson Communications, Inc., CG Docket No. 10-51 (March 9, 2011).

Sorenson states in its letter that they use their interpreters to manually note on their CDRs what should be standard telephony standard events with no need for human intervention.² Sorenson's request to permit an interpreter to manually mark a busy or no answer call for non-payment is untenable in light of Sorenson's oft-professed interest in increased measures to better ensure the integrity of calls billed to the TRS Fund and their financial capability to invest in a fully automated system. If Sorenson is not using the "answer supervision" feature to start the counting of "conversation" time then it would appear that the time between the dialed number and the connected number (estimated to average about 12 seconds per call) would be improperly included in Sorenson CDRs as billable minutes. When Sorenson applies a process which requires their interpreters to note standard telephony events, then their CDRs are inherently suspect as subject to human error, fraud and abuse and this should not be permitted. We are mindful that Sorenson has previously reported a serious incident of their interpreters engaged in the fraudulent use of VRS which affected their CDRs.

In instances where a connected call is subsequently identified by a CSDVRS interpreter to be impermissible use of VRS (e.g., no party on the call using the video interpreter, no one using the audio portion, VRI etc.) and terminates the call or the call is otherwise identified by the interpreter as questionable, then the interpreter documents that call on a separate database the agent and station number, the time of the day and the inbound and/or the outbound caller number which is subsequently reviewed by the our management team. *The CSDVRS interpreter never touches the CDRs and we are of the firm opinion that no provider's interpreters should ever have access to the CDRs.*

To recap, CSDVRS does not involve the interpreter in marking calls or gathering any of the statistical information required to create and/or determine the compensability of a CDR. Our industry needs full automation of CDRs and a rigorous audit of the process used to create a CDR. Anything less is a disservice to the public interest.

Sincerely,

/s/

John Harris, Chief Technology Officer

Lydia Runnels, Vice President, Engineering and Development

Jeff Rosen, General Counsel

cc: Gregory Hlibok, Chief, Disability Rights Office

² As an aside, we dispute Sorenson's implied assertion that calls made to "podcasts" are not compensable calls. The Commission has never ruled that deaf and hard of hearing people cannot use video relay to access recorded information, only that relay calls to VRS provider sponsored or advertised recorded information are not compensable.